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Attorneys for Plaintiffs

JONATHAN WAYNE BOTTEN, SR.,

TANJA DUDEK-BOTTEN, ANNABELLE BOTTEN,

AND J.B.

**UNITED STATES DISTRICT COURT FOR THE
CENTRAL DISTRICT OF CALIFORNIA**

JONATHAN WAYNE BOTTEN, SR.;

TANJA DUDEK-BOTTEN;

ANNABELLE BOTTEN; and J.B., a

minor, by and through his guardian

JONATHAN WAYNE BOTTEN, SR.,

Plaintiffs,

vs.

STATE OF CALIFORNIA; COUNTY

OF SAN BERNARDINO; ISAIAH

KEE; MICHAEL BLACKWOOD;

BERNARDO RUBALCAVA; ROBERT

VACCARI; JAKE ADAMS; and DOES

1-10, inclusive,

Defendants.

Case No. 5:23-cv-00257-KK-SHK

Honorable Kenly Kiya Kato

**APPLICATION FOR LEAVE TO
FILE UNDER SEAL EXHIBITS IN
OPPOSITION TO DEFENDANTS'
MOTIONS FOR SUMMARY
JUDGMENT [LOCAL RULE 79-
5.2.2(b)]**

TO THE HONORABLE COURT AND TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that Plaintiffs JONATHAN WAYNE BOTTEN, SR., TANJA DUDEK-BOTTEN, ANNABELLE BOTTEN, and J.B. hereby submits this application to file under seal the following documents and things:

- **“Exhibit 6”** – a true and correct copy of the relevant portions of the transcribed March 3, 2021 interview of Robert Vaccari.
- **“Exhibit 9”** – a true and correct copy of a cellphone video of the incident taken by witness Edward Mangerino, produced by County Defendants in the course of discovery, bates stamped COSB001459.

See Declaration of Hang D. Le (“Le Decl.”) ¶ 2.

These documents have been designated by Defendants County of San Bernardino as confidential pursuant to the protective order entered by then-Magistrate Kenly Kiya Kato on September 19, 2023 (Doc. No. 74) in the *L.C., et al. v. State of California, et al.* matter, case no. 5:22-cv-00949-KK-SHK.

DATED: February 21, 2025

LAW OFFICES OF DALE K. GALIPO

Bv /s/ Hang D. Le

Dale K. Galipo
Hang D. Le
Attorneys for Plaintiffs